

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA**

<b>LAD SERVICES OF LOUISIANA, L.L.C.,</b>	<b>§</b>	
<b>Plaintiff,</b>	<b>§</b>	<b>CASE NO. 6:17-cv-00017</b>
<b>v.</b>	<b>§</b>	<b>JUDGE DOHERTY</b>
<b>CASHMAN EQUIPMENT CORPORATION AND</b>	<b>§</b>	<b>MAGISTRATE JUDGE HANNA</b>
<b>GULP OIL SKIMMERS, LLC</b>	<b>§</b>	<b>JURY DEMANDED</b>
<b>Defendants.</b>	<b>§</b>	

**AGREED MOTION FOR RELIEF FROM A FINAL JUDGMENT UNDER  
FEDERAL RULE OF CIVIL PROCEDURE 60(b)**

**NOW INTO COURT**, through undersigned counsel, comes the plaintiff, Cashman Equipment Corp. (“Cashman”) and the defendants, LAD Services of Louisiana, LLC and Lee Dragna (collectively referred to herein as the “Defendants”), who respectfully submit this Agreed Motion For Relief From a Final Judgement Under Federal Rule of Civil Procedure 60(b) because of the dispute regarding the reported settlement that was the basis for the dismissal of this case. The parties submit their Supporting Memorandum and other papers filed herewith in support of their motion.

Submitted respectfully,

**CREED LAW FIRM**

By: /s/ Richard Creed, Jr.

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**ATTORNEYS FOR DEFENDANT, CASHMAN  
EQUIPMENT CORP.**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2020, I filed electronically a true copy of the foregoing pleading. All parties received notice of this filing by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system. Additionally, true and correct copies of the foregoing were served by U.S. mail to non-participants of the CM/ECF system.

/s/ Kyle A. Ferachi

**KYLE A. FERACHI**